

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
et al.,

Defendants.

Case No. 22-CV-10018-UA (JSR)

JANE DOE 1, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

JP MORGAN CHASE & CO.,

Defendant.

Case No. 22-CV-10019-UA (JSR)

**DECLARATION OF DAVID B. HENNES IN SUPPORT OF MOTION TO DISMISS ON
BEHALF OF DEUTSCHE BANK AKTIENGESELLSCHAFT, DEUTSCHE BANK AG
NEW YORK BRANCH, AND DEUTSCHE BANK TRUST COMPANY AMERICAS**

I, David B. Hennes, declare as follows:

1. I am an attorney duly admitted to practice before this Court and a member of the law firm of Ropes & Gray LLP. I am counsel for Defendants Deutsche Bank Aktiengesellschaft, Deutsche Bank AG New York Branch, and Deutsche Bank Trust Company Americas (collectively, “Deutsche Bank”) in the above-captioned case.

2. I submit this declaration in support of Deutsche Bank’s Motion to Dismiss filed contemporaneously herewith. Based on my involvement in this action, I have personal knowledge of the information set forth herein, and if called as a witness, I could and would competently testify thereto.

3. Attached hereto as Exhibit A is a true and correct copy of a fully executed General Release and Settlement Agreement between Plaintiff and the Co-Executors of the Estate of Jeffrey E. Epstein, dated [REDACTED].

4. Attached hereto as Exhibit B is a true and correct copy of a Non-Prosecution Agreement between R. Alexander Acosta, United States Attorney for the Southern District of Florida, and Jeffrey Epstein, dated September 24, 2007 and publicly available at <https://reason.com/wp-content/uploads/2021/08/Non-Prosecution-Agreement-1433.pdf>.

5. Attached hereto as Exhibit C is a true and correct copy of a Consent Order under New York Banking Law §§ 39 and 44 issued by the New York State Department of Financial Services in the matter of Deutsche Bank AG, Deutsche Bank AG New York Branch, and Deutsche Bank Trust Company of the Americas, dated July 6, 2020 and publicly available at https://www.dfs.ny.gov/system/files/documents/2020/07/ea20200706_deutsche_bank_consent_order.pdf.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: February 7, 2023

By: /s/ David B. Hennes
David B. Hennes